



Committee of Professional Agricultural Organisations in the EU
General Confederation of Agricultural Co-operatives in the EU

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COPA AND COGECA REMARKS ON THE PROPOSAL FOR A COUNCIL REGULATION ON ORGANIC PRODUCTION AND LABELLING OF ORGANIC PRODUCTS

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COPA and COGECA welcome the proposal for a Council Regulation on organic production and labelling of organic products. This proposal is an important step forward in the development of European organic farming as it clarifies and simplifies the current Regulation and adjusts the production conditions for this type of products in the EU.

COPA and COGECA particularly stress the importance of following aspects :

- The promotion of a harmonised concept of organic farming and the prohibition to use terms that mislead consumers;
- The extension of the scope of the Regulation so as to include products that are not yet covered by the current Regulation;
- Better controls which are crucial to enhance consumer confidence in this type of production.

Yet, COPA and COGECA would like to make several remarks on the proposal.

The proposed Regulation is general and the implementing Regulations will be determining for the implementation of the basic Regulation. Therefore, COPA and COGECA propose to set up a technical expert group within the Advisory Group on Organic Farming in order to assist the Commission in preparing the implementing Regulations.

Subject matter and scope (Art. 1)

As it is becoming an increasingly growing market for organic products, “catering” (restaurants, canteens, schools, etc.) should be included in the scope of the Regulation. To this end, appropriate control mechanisms based on a risk analysis should be introduced.

Next, the scope of the Regulation should be extended to include non-food farm products not covered by the present Regulation, like textiles and cosmetics.

COPA and COGECA request that the rules concerning organic wine be part of the specific legislation for the wine sector.

Objectives (Art. 3)

For COPA and COGECA, the objectives must also be take account of the social importance of organic production.

General farm production rules (Art. 7)

COPA and COGECA are totally opposed to the use of GMOs in organic farming. The existing ban must be maintained. The co-existence issue must be settled at Community level¹.

¹ Reserve from the organisations COAG and CIA

Flexibility (Art. 16)

The flexibility referred to in Art. 16 must be clearly defined and restrained to climatic reasons. If standards for organic agricultural production are exaggeratedly reduced, the difference between an organic and a conventional product will tend to become void in the mind of consumers.

Flexibility shall not create trade barriers within the EU or provide unfair competitive advantage to one region or Member State over another.

Exceptions for well defined non-climate related reasons can be made for a temporary period. When flexibility is granted, the situation should be monitored to ensure that circumstances leading to unfair competition do not develop.

Appropriate funds must be granted for research in organic farming so as to gradually eliminate flexibility that does not relate to climatic conditions.

Labelling (Art. 17) and compulsory indications (Art. 18)

The Community logo should be developed in parallel with other regional or national logos so as to take account of regional specificities, while remaining voluntary. As regards the use of the Community logo and its equivalents in the various languages on imported products, COPA and COGECA consider that these indications should not mislead consumers about the European or non-European origin of the product. Therefore, COPA and COGECA request that all organic products shall bear an indication of the Member State or third country the product comes from. This indication must be clearly visible to consumers.

COPA and COGECA oppose the use of the indication « EU-ORGANIC » and its equivalents in the various languages on imported products. It can mislead consumers. When this indication were to be allowed on imported products, consumers might believe that these products have been produced in the EU. If the Commission wants to indicate that a product complies with the EU control system, the term “Organic farming – EU control system” and its equivalents in the various languages as set out in Reg. 2092/91 seems more appropriate.

It might be necessary to modify the European organic logo because it is too similar to the European logo for Protected Designations of Origin (PDO), Protected Geographical Indications (PGI) and Traditional Specialities Guaranteed (TSG).

Controls (Title V)

COPA and COGECA welcome the introduction of the obligation to set up a system of approved control bodies as it will contribute to the harmonisation of the control systems in the Community. However, for COPA and COGECA, the draft Regulation should specify that the control bodies must be accredited in accordance with standard EN 45011.

The introduction of the new control system in the various Member States shall in no case increase bureaucracy for producers. In addition, the certification cost for the organic stakeholders must remain reasonable. The new system should put a halt to fraudulent practices in the current system such as the delivery of forged certificates.

All organic stakeholders should be subject to the control system, whatever their size.

Trade with third countries (Title VI)

For COPA and COGECA, imports must comply with the European legislation. The Codex Alimentarius only provides for a list of guidelines for organic farming and these guidelines will be much less constraining than the production standards applied to European organic

products. As a consequence, COPA and COGECA are of the opinion that a product that complies with the standards of the Codex should not be considered equivalent to a product complying to the European standards.

Equivalence could be granted if the guidelines of the Codex Alimentarius were strengthened with a view to harmonising them with the Community standards for organic farming.

As regards third countries applying production standards and control systems equivalent to those of the European Union, the recognition of this equivalence should be mutual, both on part of the Commission for organic products from these countries and on part of these countries for European organic products.

Final and transitional rules (Title VII)

As regards flexibility, it is understandable that the Commission would like to make use of the "Management Committee" procedure. However, given the new structure of the Regulation and as the implementing Regulations will be of fundamental importance for organic agricultural production, the "Regulatory Committee" procedure seems more appropriate. Therefore, the current system should remain unchanged.
